

BEFORE THE
Federal Communications Commission

WASHINGTON, D. C. 20554

ORIGINAL

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FILE

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Bradenton, Florida))

MM Docket No. 92-59
RM-7923

To: Acting Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

CONSOLIDATED REPLY COMMENTS

Sunshine State Broadcasting Company, Inc. ("Sunshine"), licensee of radio station WDUV(FM), Bradenton, Florida, and the petitioner in the above-captioned proceeding, hereby submits its consolidated reply comments. Comments in the proceeding were filed by Entertainment Communications, Inc. ("Entertainment"), licensee of radio station WYUU(FM), Safety Harbor, Florida, and a counterproposal was filed by High Point Broadcast Partners, who seek to allot Channel 275A to High Point, Florida.

Comments of Entertainment Communications

Entertainment opposes the Sunshine petition, contending that although Sunshine's proposed reference point meets all of the Federal Communications Commission's Rules and Regulations, the Federal Aviation Administration would not approve a tower either at the reference point or anywhere within the area in which Sunshine could construct its facilities. Attached as Exhibit A to these reply comments is the affidavit of John P. Allen, a recognized airspace consultant retained by Sunshine to assess the merits of

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Entertainment's contention. Mr. Allen concludes that the report of Entertainment's airspace consultant, Aviation Systems Associates, Inc. ("ASA") is simply wrong in one of its principal assertions, and that its analysis of the likelihood of the approval by the FAA of a tower in the area is seriously flawed.

As the Commission reiterated in FM Table of Allotments, (West Palm Beach, Florida),⁶ FCC Rcd 6975,6976 (1991), so long as a "theoretical site which meets the Commission's...technical rules" exists, it

will [be] presume[d] at the allotment stage [to be] theoretically available, and [the Commission] will utilize it as a basis for making allotments. The Commission will, however, take into account a showing by a party that, in reality, no theoretical sites exist because of environmental, air hazard, or other similar considerations. Id.

In West Palm Beach, the Commission denied reconsideration of a previous order upgrading Channel 282C1 at West Palm Beach to Channel 282C. Both the petitioner and the commenter filed reports by airspace consultants that there was a potential hazard to airspace navigation. Nevertheless, the Commission concluded that

[s]ince the airspace consultants retained by [the parties] disagreed as to the availability of a site meeting FAA concerns, we followed our usual practice of deferring a determination as to the suitability of a transmitter site to the application stage when an actual site proposal is before the Commission. Id.

The ASA study purports to be an all-inclusive examination of airspace and is advanced by Entertainment as a compelling showing that proves conclusively that the FAA would not approve a tower anywhere within Sunshine's allowable zone. The first analysis by ASA uses the reference point proposed by Sunshine. ASA finds that the reference point would affect an FAA instrument departure procedure at the Peter O'Knight Airport, that the reference point

is located within an area that ASA has identified as a VFR flyway, and, further, that the proposed tower would require an increase in the minimum radar vectoring altitude of the military traffic of Mac Dill Air Force Base. ASA believes that "this impact [on military traffic] would be the most potent and substantial adverse impact," and goes on to state

our experience in flying hours of the civil and military radar operations for the area over the years has shown us that the FAA cannot and would not amend or increase these radar altitudes due to the close proximity of all of the airports within or close to the FAA permissible zone. ASA study at p. 2.

Mr. Allen conclusively demonstrates in his affidavit, however, that a tower at the reference point would not require any changes to existing departure procedures at the Peter O'Knight Airport.

Entertainment's expert has also failed to take into consideration a number of changed and changing circumstances concerning the airspace that they evaluated. ASA claims that the proposed site is within the protection area of several VFR routes, citing as the VFR routes Interstate 75, a railroad track, a highway, and the Tampa Bay coastline. Mr. Allen points out that, although at one time that may have been true, ASA does not take into consideration the establishment of the Tampa Terminal Control Area ("TCA"). That TCA has significant impact on VFR flight in the area, including a minimum height limitation for VFR aircraft of twelve hundred feet, as well as requirements for the installation of transponders with altitude reporting capability, and for aircraft radios sufficient to enable two-way communications with air traffic control facilities. Restrictions on congested areas, plus the TCA floor, would seriously reduce the association of the structure cited by ASA with the VFR route. Mr. Allen concludes

that this airspace change alone has moved the VFR route much further to the east and that the VFR route to the area is now associated with Highway 301, which is miles from the Sunshine reference point. Further, Mr. Allen points out that the roads and coastlines identified by ASA as VFR routes in fact run through four cities or towns that fall within the definition of Federal Air Regulations Part 91.119 as congested airspace. A VFR route cannot run over congested airspace because pilots are required to maintain 1,000 feet above the surface and within a 2,000 foot radius of the aircraft. A VFR route determination is made by an airspace specialist taking into consideration minimum altitude requirements, historic weather patterns, the floor of controlled airspace, and the regulatory avionics equipment associated with operations near a TCA. In short, the ASA study is not at all a compelling showing, since it addresses in a vacuum only the existence of a road or coastline, and does not make the kind of sophisticated analysis that is necessary in determining aeronautical impact.

Similarly, in what ASA describes as the principal adverse aeronautical impact, the minimum vectoring altitude, ASA failed to address one critical component. The primary beneficiary of the minimum vectoring altitude is Mac Dill Air Force Base, a base the closing of which has already been announced and from which half of its aircraft have already been removed; the final squadron of aircraft assigned to Mac Dill is making preparations for permanent departure. Further, the FAA is in the process of revising all of the airspace associated with Mac Dill Air Force Base, including revoking the airspace minimums associated with identified F-16 recovery procedures. ASA did not even mention the closing of Mac Dill in its study.

At Sunshine's proposed reference point, Entertainment's own consulting engineer concedes that the site meets all of the Commission's Rules, Regulations, and policies. The compelling showing of the unavailability of the site rests on the ASA study which apparently relied on someone's experiences years ago in the Tampa area and does not take into consideration recent changes in the airspace or the changes that will take place on the scheduled closing of Mac Dill Air Force Base.

As noted in West Palm Beach, supra, the Commission noted that the commenter in that proceeding had provided an in-depth analysis of potential air hazards at only one of several theoretically available sites. Here, the in-depth analysis at the proposed reference site was seriously flawed. ASA tries to project its analysis of three factors over the entire allowable area. Two of those factors, the VFR routes through the area, and the radar vectoring altitude, have already been demonstrated by Mr. Allen to have limited and shifting applicability. ASA is probably correct in its assessment of constraints existing in those limited circumstances in which certain portions of the allowable area are located near airports and a tall tower might affect their airspace. However, ASA does not define those areas, and concedes that it would only be in certain portions. It certainly has not met the requirements of establishing that there would be an adverse aeronautical determination throughout the entire area.

The Commission has wisely chosen not to second guess the FAA on aeronautical matters or to predict how the FAA would rule on a given proposal. The analysis of the construction of structures and their impact on air navigation is best left to the FAA, the position recognized in West Palm Beach, supra. As has

been shown, Entertainment has failed to demonstrate conclusively that no theoretical conforming site exists anywhere in the allowable area, and there is a reasonable basis for presuming that such a site exists.

High Point Counterproposal

High Point Broadcast Partners proposes the addition of Channel 275A to High Point, Florida, a proposal that conflicts with Sunshine's request for Channel 278C in Bradenton. High Point, Florida is not a community; it is a trailer park in Hernando County, Florida, located in an unincorporated area near the community of Brooksville. The Commission will not allot a channel to an area that is not a community, and in making the decision on whether a particular area is a community for allotment purposes, the Commission looks primarily to such objective indicia of community status as "cultural, commercial, and governmental institutions...identifying themselves with [a named] community..." Virgie, Florida, 66 Rad.Reg.2d (P&F) 1831,1832 (1989).

High Point is listed in the 1992 Rand McNally Commercial Atlas and Marketing Guide, 123rd Edition, as a census designated place, with the notation in the Guide that High Point is a census area only. According to Rand McNally, High Point is not a county seat, has no post office, and is not incorporated. From the 1980 census to the 1990 census, the population increased from 1,727 people to 2,814. According to Hi-Tower Realty, the company that lists the lots in the High Point trailer park for sale, there are 1,487 lots that have sold. It is obvious that the vast majority of people who live in this census designated area live in the trailer park. The inclusion of an area in the US Census, however, is not dispositive

of the question of whether or not a given area constitutes a community for allotment purposes. Trade, Tennessee, and Beech Mountain, North Carolina, 69 Rad.Reg.2d (P&F) 1731,1733 (1991).

Attached to these Reply Comments as Exhibit B is a statement from Karen Nicolai, the clerk of the circuit court of Hernando County. She describes High Point as a "mobile home subdivision" and states that "[p]olice, fire, and utility services for High Point are all provided by the County.

Attached as Exhibit C is the statement of Robert W. Nelson, Vice-President of Sunshine State Broadcasting Company, Inc. Mr. Nelson states, under penalty of perjury, that he visited High Point, Florida, on Saturday, June 6, and Sunday, June 7, 1992, and found that High Point is a trailer park, with access limited to residents or guests of residents. He goes on to describe the area outside of the trailer park as an old strip mall, with a combination drycleaner/laundromat, an insurance agency and a beauty salon; nearby is a carwash, a company that sells trailers, and another company that sells both real estate and trailers.

Attached as Exhibit D is a copy of a fax received from Hi-Tower Realty, pointing out the "highlights" of High Point. For a monthly maintenance fee of \$16.00, residents of High Point get a 24 hour security guard at the gate, lighted streets, and maintenance of the tennis courts, the horseshoe courts, the shuffle board courts, the clubhouse, and the pool. In short, High Point is nothing more than a trailer condominium, and the Commission does not assign FM channels to apartment complexes or highrise condominiums. It should not assign a channel to a low-rise condominium, either.

Attached as Exhibit E are excerpts from the Brooksville,

Spring Hill, Weeki Wachee Telephone Book, December 1991--1992, published by Bell South Advertising and Publishing Corporation. Page 67 of the Brooksville portion of the telephone book white pages includes High Point; there are a total of five telephones assigned to entities that identify themselves as High Point. Three of those five entities are located inside the trailer park, including the clubhouse, the guardhouse, and the golf club. Two businesses, a beauty salon and a coin laundry, identify themselves with High Point.

The counterproposal is blatantly misleading. In Paragraph 4 of the counterproposal, it is stated "High Point has numerous local businesses, its own hospital, library, banking institutions, and phone exchanges." Not one of those representations is true. Although petitioners are not held by the Commission to the same standards as applicants, they should be. This type of blatant misrepresentation, in order to induce the Commission to act, would not be tolerated of an applicant. Two businesses, a beauty salon and a coin laundry, identify themselves with High Point and they are located right outside the gates of the trailer park. A drycleaner/laundromat, a car wash, a beauty salon, a company that sells both real estate and trailers, a trailer sales company, and an insurance agency would not be considered "numerous local businesses". It is represented that High Point has its own hospital. Attached are pages 269 and 272 of the telephone listing the hospitals in the area. There is no hospital in High Point. It is represented that High Point has a library. Page 66 of the telephone book lists the main library and its branches. There is no library shown to be located in High Point. It is represented that High Point has banking institutions. Pages 114 and 115 of the

telephone book lists the banks in the area. There is neither a High Point bank nor any bank listing a branch in High Point.

It is represented that there is a telephone exchange. Page 10 of the telephone book lists all of the prefix codes (i.e., exchanges) in the Gainesville calling zone, which includes Hernando County. The High Point Salon and the High Point Coin Laundry, as well as the three entities located inside the trailer park, have prefix codes of 596. Prefix code 596 in the calling zone is listed to Weeki Wachee. Finally, the telephone book lists the postal zip code for "Brooksville, Florida and nearby communities." See Exhibit E, p.8. The listing of nearby communities includes no zip code for a community known as High Point. It is noted that Hi-Tower Realty, the sales agent for High Point, is located on High Point Boulevard (presumably located inside the trailer park) and that its address is identified on the agent's letterhead as Brooksville, Florida. See Exhibit D.

High Point, Florida has none of the indicia of community status that the Commission normally considers. High Point is a horizontal condominium with limited access. It does have all of the indicia of a resort condominium, but no more. There is no post office, and only two small businesses located just outside the main gate of the trailer park have High Point in their name. High Point is not recognized as nor considered to be a community. There is no indication of a resident High Point population other than inside the trailer park. There are no churches identified with High Point, there are no banks, there are no gas stations, there are no supermarkets, there is no identifiable High Point social structure outside the trailer park. If High Point is a community, so is

every large apartment complex and condominium project in the country.

Conclusion

The Commission should assign Channel 278C to Bradenton, Florida. Sunshine has complied with all the Rules, Regulations and policies of the Commission. Issues concerning the transmitter site, consistent with Commission policy, should be left for application processing. Entertainment has not conclusively demonstrated that the FAA would reject any proposal by Sunshine for specific facilities and a specific location. The counterproposal for High Point, Florida, should be dismissed; High Point is not a community within the Commission's definition for allotment purposes and hence is not deserving of a radio station.

Respectfully submitted,

SUNSHINE STATE
BROADCASTING COMPANY, INC.

By: Anne Thomas Paxson
George R. Borsari, Jr.
Anne Thomas Paxson

Its Attorneys

Borsari & Paxson
2033 M Street, N.W.
Suite 630
Washington, DC 20036
(202) 296-4800

June 17, 1992

John P. Allen

EXHIBIT A

Airspace Consultant

Telephone
(904) 261-6523
FAX (904) 277-3651

P.O. Box 1008
Fernandina Beach, Florida 32034

STATE OF FLORIDA)

)

COUNTY OF NASSAU)

AFFIDAVIT OF JOHN P. ALLEN

I, John P. Allen, being first duly sworn, do hereby depose and state that I am an Airspace Consultant in private practice, with offices at 1628 Calhoun Street, Fernandina Beach, Florida. My qualifications are a matter of record with the Federal Aviation Administration (FAA) and the Federal Communications Commission (FCC). A brief resume is attached hereto as "Attachment A."

I have been retained by Sunshine State Broadcasting Company, Inc. ("Sunshine") to conduct an independent aeronautical evaluation of Sunshine's permissible site location area for Channel 278C. Specifically, I was requested to determine whether the comments filed by Aviation Systems Associates (ASA) regarding the permissible site area would preclude Sunshine from receiving a determination of no hazard to air navigation.

My independent aeronautical evaluation was conducted in accordance with the standards for determining obstructions to the navigable airspace as set forth in Subpart C of Part 77 of the Federal Aviation Regulations. Sunshine in their application

specified a reference site at Coordinates: Latitude 27-49-20 North - Longitude 82-21-50 West.

ASA stated that their in house evaluation disclosed that the proposed reference site would impact aircraft departing Runway 17 from the Peter O.Knight Airport and would require the establishment of a departure restriction for any height above 970 feet AMSL. My evaluation disclosed that the reference site which is located some 42,418 feet from the departure end of Runway 17, would not require any changes to the existing departure criteria for aircraft departing Runway 17. At 42,418 feet, the allowable height under the departure criteria as stated in the United States Standard for Terminal Instrument procedures (TERPS), is 1103 feet AMSL. Therefore, a height of 1049 feet AMSL is some 54 feet below this aeronautical surface.

ASA has stated that the proposed reference site is located within known VFR Routes (Interstate-75, U.S. Highway 41 and the coastline) and that these routes would limit the height of the proposed tower to 500 feet above ground level (AGL). One must recognize that the term VFR Route does not exist within the criteria of FAR Part 77. The FAA specialist in making this judgement determination must take into account several factors.

The mere fact that the proposed reference coordinates are near a highway, does not automatically require the issuance of a

determination of hazard based upon a VFR Route, as these routes are continuously changing based on airspace requirements that are

continuously changing.

When the FAA's commissioned the Tampa Terminal Control Area (TCA) with a floor of 1200 feet MSL above the proposed reference site and the requirements of a transponder with altitude reporting capability and two-way communications with the air traffic control facility, this VFR Route may in fact be associated with Highway 301 east of the reference site and not I-75.

Additionally, within the permissible site area there are 4 cities, towns or settlements that would meet the requirement of congested airspace as defined by FAR Part 91.119 (Minimum Safe Altitudes). Aircraft operating in the vicinity of Sun City, Sun City Center, Ruskin and Yankee, are required to maintain 1000 feet above the surface within a 2000 foot radius of the aircraft. FAA in assessing whether or not a proposed structure would infringe on a VFR Route must take into consideration the floor of controlled airspace, the historic weather patterns (thunderstorms, fronts, etc.), the minimum altitude requirements (FAR Part 91.119) and the regulatory avionics equipment associated with operations within 30 miles of the primary airport within the TCA. When all these aforementioned requirements are factored in by FAA, especially the floor of the TCA airspace of 3000 feet MSL over Highway 301 compared to 1200 MSL at the reference site, the route that should be protected would be Highway 301. The proposed reference site provides this

protection from Highway 301, as it is more than 2 statute miles from the highway centerline.

ASA has also stated in their in house evaluation that the present minimum vectoring altitude would only allow for an overall height of 649 feet AMSL within the permissible site location area. It is apparent that ASA has elected only to address the airspace as it is today or as it was in the past. The primary beneficiary of the 1600 foot minimum vectoring altitude is Mac Dill AFB. The 1600 foot limit was established to facilitate the recovery of F-16 aircraft from either over the Warning Areas west of Tampa, or from the Avon Park bombing range east of Tampa. With the already announced closing of Mac Dill and with one F-16 squadron already removed and second and last squadron getting ready to leave, the FAA is in the process of revising all the airspace associated with Mac Dill. This includes revoking the airspace associated with the identified recovery procedures.

In conclusion, it is my professional opinion that ASA in conducting their in house evaluation did not address the closing of Mac Dill AFB, the revoking of the current aeronautical procedures associated with Mac Dill AFB, and the regulatory requirements associated with the Tampa Terminal Control Area regarding VFR Routes. There are many factors that are used by FAA in evaluating proposed obstructions. Future airspace changes and revisions or revocation of aeronautical procedures are paramount

protection from Highway 301, as it is more than 2 statute miles from the highway centerline.

ASA has also stated in their in house evaluation that the present minimum vectoring altitude would only allow for an overall height of 649 feet AMSL within the permissible site location area. It is apparent that ASA has elected only to address the airspace as it is today or as it was in the past. The primary beneficiary of the 1600 foot minimum vectoring altitude is Mac Dill AFB. The 1600 foot limit was established to facilitate the recovery of F-16 aircraft from either over the Warning Areas west of Tampa, or from the Avon Park bombing range east of Tampa. With the already announced closing of Mac Dill and with one F-16 squadron already removed and second and last squadron getting ready to leave, the FAA is in the process of revising all the airspace associated with Mac Dill. This includes revoking the airspace associated with the identified recovery procedures.

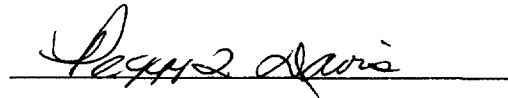
In conclusion, it is my professional opinion that the ASA evaluation failed to take into account a large number of airspace factors that are used by the Federal Aviation Administration in evaluating proposed obstructions. The recent addition of the designation of the airspace in the Tampa area as a Terminal Control Area and the associated requirements placed on aircraft to have transponders with altitude reporting (Mode C) capability to fly near or under the TCA has a significant impact on VFR

flight, as well as the closing of the Mac Dill Air Force Base, the revamping of the aeronautical procedures associated with Mac Dill, and the upcoming conference on revising the airspace associated with the Tampa control area were not considered. Further, ASA is incorrect in its evaluation of the impact of the proposed structure regarding the Peter O. Knight Airport. Future airspace changes and revisions or revocations of aeronautical procedures are paramount to the FAA's evaluation process. ASA has not identified any of the foregoing matters, including the congested airspace issue, and I cannot agree with their conclusion.

Respectfully submitted,


John P. Allen

Subscribed and sworn to before me, the undersigned Notary Public, this 1/12 day of June, 1992, by the within-named John P. Allen, well known to me to be the person executing this document.



Notary Public

My Commission Expires:

**NOTARY PUBLIC, STATE OF FLORIDA
MY COMMISSION EXPIRES: JUNE 13, 1992
BONDED THRU NOTARY PUBLIC UNDERWRITERS**

ABOUT JOHN P. ALLEN

PROFESSIONAL EXPERIENCE:

Airspace Consultant 1981-Present: Conducts aeronautical evaluations for proposed construction or alteration of structures; files appropriate forms with the Federal Aviation Administration; amends aeronautical surfaces when required; conducts negotiations and provides testimony on behalf of sponsors with FAA, FCC or local governmental bodies concerning technical matters relating to Aviation Safety.

FAA Air Traffic Controller 1968 to 1981

U. S. Air Force Air Traffic Controller 1964 to 1968

PROFESSIONAL ACTIVITIES:

Representative to the National Transportation Safety Board as an expert in air traffic control 1975 to 1977

Chairman of the Facility Air Traffic Technical Advisory Committee 1975 to 1977

Representative to the National Aviation Safety Council 1977 to 1981

Member of the Society of Broadcast Engineers

Member of the Fernandina Beach Airport Advisory Commission

Associate Membership:

Association of Federal Communication Consulting Engineers

National Association of Broadcasters

EDUCATION:

Bachelor of Science Degree. Management/Small Business Administration 1977, Jones College, Jacksonville, Florida

Professional Certifications: Air Traffic Controller



EXHIBIT B

KAREN NICOLAI

CLERK OF CIRCUIT COURT - HERNANDO COUNTY, FLORIDA

20 N. MAIN STREET

BROOKSVILLE, FLORIDA 34601

(904) 754-4201

June 10, 1992

Mr. Robert Nelson
WDEV Radio
Bradenton, Florida

Dear Mr. Nelson:

This is to verify that High Point is a mobile home subdivision located in unincorporated Hernando County. Two municipalities are located in Hernando County, being the City of Brooksville and the City of Weeki Wachee. Police, fire, and utility services for High Point are provided by the County.

If any further information is needed, please feel free to contact this office.

Sincerely, .

Karen Nicolai
Clerk of Circuit Court

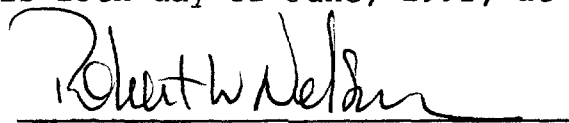
KN:jsk

STATEMENT

I, Robert W. Nelson, Vice President of Sunshine State Broadcasting Company, Inc., licensee of Radio Station WDUV(FM), Bradenton, Florida, hereby state as follows:

1. On Saturday and Sunday, June 6 and 7, 1992, I visited the area identified as High Point, Florida.
2. High Point, Florida, is not a community. It is a trailer park, with access limited to residents and guests of residents. An old strip mall, with a combination drycleaner/laundromat, an insurance agency, and a beauty salon, is located next to the entrance road but outside the gates of the trailer park. A car wash and a company that sells trailers are nearby. Another company, that sells both trailers and real estate, is next to the entrance road directly across from the strip mall; it is also outside the gates of the trailer park.
3. From my inquiries, people in the area do not identify with a community of High Point; rather, High Point is considered to be the trailer park.
4. When I checked with the Florida Highway Patrol at Brooksville for directions, they never heard of High Point.

I state, under penalty of perjury, that the foregoing is true and correct. Executed this 15th day of June, 1992, at Bradenton, Florida.


Robert W. Nelson

JUN-18-92 WED 10:31 ID:HI-TOWER REALTY 1669 AT45 P01

EXHIBIT D



HI-TOWER REALTY, INC.

GARY J. DE CRUCES, REALTOR/BROKER

7248 HIGHPOINT BLVD., BROOKSVILLE, FL 34613

PHONE 904-596-2087

FAX 904-596-1889

OUT OF STATE 1-800-359-3137



6-10-92 To Thally Whitehurst
Fax 813-388-2119
HI LIGHTS OF HIGH POINT:

Monthly maintenance fee \$16.00 per month, paid 2 months at a time. This covers 24 hour security at the gate, lighted streets and the maintenance and care of the common areas such as the tennis courts, horse shoe courts, shuffle board courts, club house and pool.

***** County water and sewer, on your own meter, is about \$24.00 per month which gives you 3000 gal of water. For each thousand gal. over that \$1.00 per thousand.

***** Electric of course depends on what you use, your own meter also.

***** Garbage pick up, twice a week and is about \$18.00 every 3 months. Stop the service when you are not here.

Social and Travel Clubs are very active. Cable TV available. Financing available. Maintain your own property. There are many lawn services available if you are not here to keep grass cut. Other costs to live or own here: insurance, telephone and Real Estate taxes.

Golf course but you must have a certificate and then join in order to play. Certificates can be purchased for \$1,500.00 or get by a transfer \$350.00 if property you are purchasing already has one. Yearly club dues are about \$1,000.00 per couple.

Lot sizes are 60 x 100 off the golf course and average 60 x 125 on the golf course. Lots are priced (at this time) \$8500 and up. Golf course lots begin \$11,500.00.

Financing available at some local banks.

TO HAVE UTILITIES CONNECTED:

WITHALACHOCHEE RIVER ELECTRIC CO-OP
PO BOX 5100
SPRING HILL, FLORIDA 34606
(904- 596-4000)

Send a credit report from your present Electric Co. along with \$45.00 and tell them the date you want service to begin.

HERNANDO COUNTY UTILITIES
202 JEFFERSON ST.
BROOKSVILLE, FLORIDA 34601
(904 754 4037)

Connection fee is \$95.00. Give them the date service is to start

GARBAGE PICK UP Bob Harris 796-5808

Please call me if additional info. needed - he ask

HERNANDO SANDPIT & WOOD FACILITY

10032 Sunshine Grove Rd 597-2541

Hernando Shores Realty Inc

4006 Shoal Line Blvd Hernando Bch 596-7035

Hernando Stucco & Roofing 796-6413

HERNANDO SURGICAL ASSOC—**11371 CORTEZ BLVD** 596-5615**44 VETERANS AV** 799-7140

Hernando Termite Control 102 Bell Av 796-5049

HERNANDO THERMAL DIAGNOSTIC LAB

6317 Sealawn Dr Spring Hl 683-4670

HERNANDO TIMES—ST PETERSBURG**TIMES—**

Brooksville Office—

201 Howell Avenue—

Circulation—

Customer Service—Home Delivery

Suite 301

Suite 101

..... 796-4456

Advertising—

Classified Ads 754-6111

Advertising Sales Representatives 754-6110

News 754-6101

Spring Hill Office—

3233 Commercial Way—

Circulation—

Customer Service—Home Delivery

Times Square—Suite 101

..... 796-4456

Advertising—

Classified Ads 754-6111

Advertising Sales Representatives 683-9652

News 683-8483

All Other Departments 754-6100

HERNANDO TODAY—

Advertising 15009 Cortez Blvd 796-1949

Business Office 15009 Cortez Blvd 796-1949

Circulation 15006 Cortez Blvd 754-9000

Newsroom 15006 Cortez Blvd Bksv 799-4665

Greensheet 15009 Cortez Blvd 796-1949

Hernando Tree Service 683-9904

Hernando Tribune—Tampa Tribune—

Home Delivery 813 S US Highway 41 796-6715

Want Ads 813 S US Highway 41 796-6715

Hernando Tuff & Tractor 1595 E Jefferson St 754-9555

Hernando United School Workers

7288 Sunshine Grove Rd 597-1084

Hernando Upholstery 1195 Howell Av Bksv 796-8775

Hernando West Liquors 5431 Spring Hill Dr Spring Hl 686-1867

Hernando West Liquors 5431 Spring Hill Dr Spring Hl 686-5570

HERNANDO WOODS

See Our Ad At Retirement & Life

Care Communities & Homes

7251 Grove Rd 596-4097

Hernando Yellow Cab Spring Hill Tel No - 686-0607

Hernando Youth Leagues Inc 1 Youth Dr 799-3074

HERNASCO TESTING LAB INC**BROOKSVILLE TEL NO - 596-1092**

Hernden Arthur B 3 Woodhaven Rd 796-3695

Hernden Wesley F 16362 Melissa St 799-2203

Herne M 1512 Oakhurst Dr 796-7138

Herner Irvin C 1067 Lakeside Dr 754-8810

Herns Leo 1098 Roosevelt Av 799-8085

Herold Richard H 6527 Barcelona Blvd 796-7886

Herold Walter J 9004380 N US Highway 41 799-8353

Herr E 9210 Commercial Way 596-7789

Herr Edward 9003042 N US Highway 41 796-0957

Herr Joseph 4243 Camelia Dr Spring Hl 596-0985

Herr Michael 891 Village Dr 799-7896

Herremann L B 8119 Forest Villa Cir Spring Hl 688-8557

Herrera Rolando & Magdelyne 683-7790

Herriman Kenneth 26393 McAllister St 799-3426

Herriman Vernon M 15361 Brookridge Blvd 596-3034

Herrin B A 7208 Ursula Av 796-8568

Herrin Jarvis C 4059 Ligonier Rd Spring Hl 666-0397

Herrin Rob 11107 Baylor Dr Spring Hl 688-4067

Herrington Joseph 5432 Fern Dr Spring Hl 596-3491

Herring M 7552 Eagle Dr 596-1275

Herring William 16054 Brookridge Blvd 597-4597

Herrington C G 7076 Fireside St Spring Hl 683-5007

Herrington G 8250 Rambler Dr 754-1814

Herrington Ivan T & Mildred

11436 Sheffield Rd Spring Hl 686-2640

Herrington John C 3517 Flamingo Blvd 596-6982

Herrington Thomas E 130 Ederington Dr 799-0318

Herrman Bernhard & Betty

10275 Belltower St Spring Hl 683-0336

Herrmann Richard S 6097 Mountain Way Av Spring Hl 596-3773

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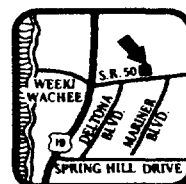
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